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16  
17 Attorneys for Plaintiff  
18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 No. CR 18-50 (B) -JAK

23 Plaintiff,

24 v.  
25 JOINT STATEMENT REGARDING WITNESS  
LIST FOR EVIDENTIARY HEARING ON  
LOSS AMOUNT

26 YI-CHI SHIH,  
27 aka "Yichi Shih,"  
aka "Yuqi Shi," et al,

28 Defendants.

## JOINT STATEMENT

2 Plaintiff United States of America, by and through its counsel  
3 of record, the Acting United States Attorney for the Central District  
4 of California, and Assistant United States Attorneys Judith A. Heinz,  
5 James C. Hughes, William M. Rollins, Melanie Sartoris, and Khaldoun  
6 Shobaki; and Defendant Yi-Chi Shih, by and through his counsel of  
7 record, James W. Spertus, Christa Culver Wasserman, and M. Anthony  
8 Brown, hereby file this Joint Statement Regarding the Witness List  
9 for the Evidentiary Hearing on Loss Amount, scheduled for June 17,  
10 2021:

11       1. The parties understand that each side shall have a total of  
12 90 minutes combined (i.e. 90 minutes for the government and 90  
13 minutes for the defense) for any direct, cross examination, and re-  
14 direct of all witnesses, including rebuttal witnesses, who testify  
15 during the June 17, 2021 hearing.

16       2. The Defense objects to the 90-minute limitation and  
17 believes 90 minutes will be insufficient for adequate defense cross-  
18 examination of government witnesses and the presentation of its  
19 rebuttal evidence.

20       3. The government expects to call Dr. Christopher Nordquist  
21 and Dr. David Sandison. The defense expects to call Dr. Ion Opris.  
22 All three witnesses will testify in person.

23           4. The parties jointly request that the Court adopt the  
24 following procedure and order of testimony during the hearing:

25 a. The government shall be permitted to conduct a direct  
26 examination of Dr. Nordquist and/or Dr. Sandison.

27       b.     The defense shall be permitted to conduct a cross  
28                   examination of Dr. Nordquist and/or Dr. Sandison.

- c. The government shall be permitted to conduct a redirect examination of Dr. Nordquist and/or Dr. Sandison.
- d. After the government's expert(s) testify, the defense shall conduct a direct examination of Dr. Opris.
- e. The government shall be permitted to conduct a cross examination of Dr. Opris.
- f. The defense shall be permitted to conduct a redirect examination of Dr. Opris.
- g. The government shall be permitted to call Dr. Nordquist and/or Dr. Sandison in rebuttal if the government has time remaining from its 90 minutes, subject to the same direct, cross, and redirect procedures set forth above.

Dated: June 14, 2021

Respectfully submitted,

TRACY L. WILKISON  
Acting United States Attorney

CHRISTOPHER D. GRIGG  
Assistant United States Attorney  
Chief, National Security Division

*/s/*  
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JAMES C. HUGHES  
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/s/ via email authorization  
JAMES W. SPERTUS  
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